

PUBLIC STATEMENT OF JUDITH SAUM

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MS. SAUM: I will be making comments on behalf of the Nevada Public Health Association today. These comments are taken from a policy resolution that was drafted by the Nevada Public Health Association regarding the proposed, permanent, high level, nuclear waste repository at Yucca Mountain. The resolution was then passed on to the American Public Health Association, and after undergoing a rigorous approval process the resolution was formally adopted by the American Public Health Association at its annual convention in Chicago several weeks ago.

Just to give you a little bit of background, the American Public Health Association is made up of affiliate state organizations such as ours from Nevada, and represents more than 50,000 public health professions throughout the country.

I will continue to refer to it as APHA by its initials. I'm going to highlight some of the major concerns addressed by that organization by APHA in the resolution.

1 The ground water issues are a big one. The resolution expresses alarm at recent DOE studies showing the surface water infiltration and the rate of ground water contamination will take place in the Yucca Mountain area much more rapidly than previously thought. As a result of those studies, APHA believes that there is a potential for radionuclide exposure to residents living nearby in the Amargossa Valley.

Also noted in the resolution is the fact that Nevada's largest dairy which serves the Los Angeles commercial market is located in that valley. And I believe the Draft Environmental Impact Statement fails to address this issue.

2 The transportation of nuclear waste traveling across the country is also a major issue and concern. It's known that the waste will travel through 43 states putting 50 million people living within one-half mile of the transportation routes at potential risk for varying amounts of radiation exposure.

3 The resolution also discusses the high frequency of earthquakes in the vicinity of Yucca Mountain, making it uncertain and difficult to predict the protection of the public's health.

4 I would like to point out that the APHA resolution does not agree with the proposed action outlined in the Draft Environmental Impact Statement which supports the Yucca Mountain site. To the contrary, as part of the implementation process for the resolution, APHA will urge the Secretary of Energy to declare the Yucca Mountain site unsuitable for the development of a nuclear waste repository.

As part of the implementation of the resolution APHA will create a task force within the organization to research and recommend alternative solutions for storage of the nation's high level nuclear waste, and the organization is committed to completing a lengthy position paper towards that goal this next year.

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In other words, the APHA resolution supports a reasonable alternative action for high level nuclear waste storage, one which will minimize the risks to public health for all generations living within the nation's borders.

On behalf of the Nevada Public Health Association, I would like to submit a draft of the APHA resolution for the record. Please note that there are a few items that have been crossed out and replaced by other wording, and that's because these changes were made by the governing council at the APHA convention. They will be sending us a final draft in the next few weeks. Thank you.

*Declare Proposed National Permanent Nuclear Waste Repository Site Unsafe: Support
Alternative Nuclear Waste Research*

~~DECLARE YUCCA MOUNTAIN PERMANENT NUCLEAR REPOSITORY SITE UNSAFE. OPPOSE~~

~~LEGISLATION FOR TEMPORARY NUCLEAR WASTE STORAGE AT NEVADA TEST SITE~~

The American Public Health Association,

Having provided leadership in efforts to monitor and abate radiation hazards for more than 40 years;¹ and

Knowing that the Department of Energy (DOE) must demonstrate through scientific studies that the proposed permanent Yucca Mountain repository site in Southern Nevada will safely contain and isolate the Nation's high-level nuclear waste for more than 10,000 years;² and

Noticing with alarm that legislation is pending in Congress which will establish a temporary "interim" high-level waste storage facility prior to completion of these studies at the nearby Nevada Test Site (NTS) without requiring an Environmental Impact Statement (EIS) to determine potential negative public health impacts;³ and

Concerned that location of this interim facility at the NTS will bias further scientific evaluations for suitability and safety of the adjacent Yucca Mountain site as a permanent waste repository; and

Knowing that marked, frequent seismic events in the proximity of both sites make it impossible to predict the protection of the public's health and safety from the risk of radioactive release (621 earthquakes greater than 2.5 within a 50 mile radius since 1976);⁴ and

Recognizing that this level of seismic activity exceeds current Nuclear Regulatory Commission regulations for allowing licensure as a nuclear reactor with on-site waste storage;⁵ and

Noting with alarm that recent DOE studies show that surface water infiltration and groundwater contamination will take place in the Yucca

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cont.

1 Mountain/NTS area much more rapidly than previously thought;^{6,7} and
2 Recognizing that the rate of underground flow into the drinking and
3 irrigation water of the adjacent Amargosa Valley is reason to disqualify
4 the Yucca Mountain site from further consideration as a permanent nuclear
5 waste repository according to the Nuclear Waste Policy Act (NWPA);^{8,9} and

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6 Concerned that the DOE Yucca Mountain Safety Strategy allows for
7 radioactive contamination of ground water, relying on dilution of the waste
8 to limit the radiation dose to nearby residents¹⁰ who use the water for
9 drinking, growing crops, and livestock, and for raising cows on the largest
10 dairy in Nevada to supply the Los Angeles commercial milk market; and

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11 Alarmed that pending legislation in Congress¹¹ for the NTS interim
12 facility increases the allowable radiation dose level to the public from
13 the Yucca Mountain repository ^{/to} 25 times greater than that established by the
14 Safe Drinking Water Act,¹² which is contrary to the more protective radia-
15 tion standards set by the Environmental Protection Agency (EPA) for the
16 Waste Isolation Pilot Plan (WIPP) in New Mexico;¹³ and

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17 Noting that transportation of high-level nuclear waste to the NTS
18 interim storage facility and to the Yucca Mountain permanent repository,
19 if determined suitable, will affect 43 states putting 50 million people
20 within one-half mile of the transportation routes at risk for exposure to
21 potential high levels of radiation when inevitable accidents occur, as well
22 as for lower levels of exposure during normal transportation;^{14,15} and

23 Recognizing that timely and continuing local and regional emergency
24 preparedness along all proposed transportation routes is critical to re-
25 spond to and mitigate the effects of a nuclear accident;¹⁶ and

12...

26 Recognizing that alternative means must be fully explored for managing
27 and disposing of high-level nuclear wastes to minimize health and safety

12 cont. 1 risks for current and future generations;^{17,18} therefore 1
 2 ♦ Urges the Secretary of Energy to meet his duty¹⁹ and declare the 2
 13 3 Yucca Mountain site unsuitable for development of a nuclear repository now 3
 4 or in the future, terminate all work at the site, and inform Congress of 4
 5 his actions;20 5
 14 6 ♦ Urges Congress to reject any proposed legislation for high-level 6
 7 nuclear waste storage which mandates weakening the existing radiation 7
 8 standards or excludes appropriate scientific studies designed to protect 8
 9 public health and safety;20 9
 10 ♦ Urges Congress and the DOE to insure adequate national assistance 10
 15 11 and appropriations to fund emergency management activities for state and 11
 12 local jurisdictions through which nuclear waste will be transported well 12
 13 before the first nuclear waste shipment takes place and until all shipments 13
 14 cease;21 and 14
 15 ♦ Urges Congress to financially support research for alternative 15
 16 16 methods to safeguard and manage the Nation's high-level nuclear waste and 16
 17 minimize the risks to public health for all generations.21 17
 18 18
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*Declare Proposed National Permanent Nuclear Waste Repository Site Unsafe: Support
Alternative Nuclear Waste Research*

1 ~~DECLARE YUCCA MOUNTAIN PERMANENT NUCLEAR REPOSITORY SITE UNSAFE. OPPOSE~~ 1

2 ~~LEGISLATION FOR TEMPORARY NUCLEAR WASTE STORAGE AT NEVADA TEST SITE~~ 2

3 IMPLEMENTATION SUGGESTIONS 3

4 1. Send letters of support and a copy of the proposal to members of 4
5 Congress. 5

6 2. Send letters to relevant federal agencies and coalitions. 6

7 3. Send letters and a copy of the proposal to appropriate state, city 7
8 and local agencies. 8

9 4. Send the proposal to appropriate associations. 9

10 5. Meet with the Secretary of Energy, Bill Richardson, in support of the 10
11 proposal. 11

12 6. Lobby appropriate members of Congress against ~~HR45~~ <sup>/ any legislation introduced to weaken radiation
protection standards for a nuclear waste repository</sup> 12

13 7. Research and develop a position paper for temporary and permanent 13
14 solutions for the high-level nuclear waste storage problem. 14

15 8. APHA staff and leaders should take advantage of any opportunities to 15
16 work jointly with or convene appropriate groups to discuss ways to 16
17 address and support research and dissemination of information, etc. 17
18 relevant to the main issue in the proposal. 18

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